

PD-0788-20

ENRIQUE ANGEL RAMOS,  
Appellee

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IN THE COURT OF  
COURT OF CRIMINAL APPEALS  
11/22/2021  
CRIMINAL APPEALS  
DEANA WILLIAMSON, CLERK

STATE OF TEXAS, Appellant

STATE OF TEXAS

**APPELLEE'S SECOND MOTION FOR EXTENSION OF TIME  
TO FILE MOTION FOR REHEARING**

MAY IT PLEASE THE COURT:

COMES NOW Enrique Angel Ramos, Appellee in the above cause and pursuant to TRAP Rules 79.1, files this second motion for extension of time to file a motion for rehearing and would show this Court the following:

The opinion by this Court was issued on October 20, 2021.

The due date to file a motion for rehearing is November 19, 2021.

This is Appellee's second motion for extension of time to file his motion for rehearing. Appellee seeks a two-week extension to file his motion for rehearing.

The Undersigned has not been able to timely complete this motion for rehearing for the following reasons:

The Undersigned had due on November 18, 2021, a response to a mandamus in cause number 13-21-00379-CV. An eight (8) day extension was sought to file said response but has been consistently working on it as well as the present motion for rehearing.

Because of these dual deadlines, the Undersigned has not been able to complete this motion for rehearing but should be able to complete it by December 3, 2021.

WHEREFORE, Appellee prays that this court grant his motion for extension of time to file his motion for rehearing by 14-days, which if granted, would make his motion for rehearing due on December 3, 2021.

Respectfully submitted,

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By: /s/ Victoria Guerra  
Victoria Guerra  
State Bar No. 08578900  
Counsel for Appellant

**CERTIFICATE OF COMPLIANCE**

The undersigned certifies that according to the Microsoft Word word-count tool, this document contains 215 words.

/s/ Victoria Guerra  
Victoria Guerra

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 19<sup>th</sup> day of November, 2021, the foregoing Appellee's motion for extension of time to file his motion for rehearing has been e-filed and electronically served on the following:

John R. Messinger  
Assistant State Prosecuting Attorney  
P.O. Box 13046  
Austin, Texas 78711  
[information@spa.texas.gov](mailto:information@spa.texas.gov)

/s/ Victoria Guerra  
Victoria Guerra

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Victoria Guerra  
Bar No. 08578900  
vguerrallaw@gmail.com  
Envelope ID: 59353681  
Status as of 11/22/2021 9:42 AM CST

Associated Case Party: State Prosecuting Attorney

Name	BarNumber	Email	TimestampSubmitted	Status
State Prosecuting Attorney Texas		information@spa.texas.gov	11/19/2021 4:39:10 PM	SENT

Associated Case Party: EnriqueAngelRamos

Name	BarNumber	Email	TimestampSubmitted	Status
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